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9 10	Attorneys for Trove Brands, LLC d/b/a The BlenderBottle Company			
11	IN THE UNITED STATES DISTRICT COURT			
12	FOR THE EASTERN DISTRICT OF CALIFORNIA			
13				
14	TROVE BRANDS, LLC d/b/a THE	) Case No.: 2:22-cv-02222-TLN-CKD		
15	BLENDERBOTTLE COMPANY, a Utah limited liability company,	) JOINT STIPULATION FOR ENTRY		
16	Plaintiff,	) OF PROPOSED PROTECTIVE ) ORDER		
17		) Hon. Troy L. Nunley		
18	v.	) Hon. Carolyn K. Delaney		
19	TRRS MAGNATE LLC d/b/a HYDRA CUP,	) )		
20	Defendant.	) )		
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Plaintiff Trove Brands, LLC d/b/a The BlenderBottle Company ("BlenderBottle") and Defendant TRRS Magnate LLC d/b/a Hydra Cup ("Hydra Cup") by and through their undersigned counsel, hereby request that the Court enter the attached [Proposed] Stipulated Protective Order which has been agreed upon by the parties. This [Proposed] Stipulated Protective Order seeks to protect the parties' interests in the confidentiality of certain proprietary, competitive, and sensitive documents and is attached as Exhibit A. The parties have agreed to the terms of the Proposed Stipulated Protective Order in order to maintain the confidentiality of information produced or obtained in this action and respectfully request the Court approve and enter the Stipulated Protective Order.

- 1 - Stipulation for Entry of Protective Order Case No. 2:22-cv-02222-TLN-CKD

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2		Respectfully submitted,
3		KNOBBE, MARTENS, OLSON & BEAR, LLP
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5	Dated: September 11, 2023	By: <u>/s/ Jacob R. Rosenbaum</u> Ali Razai
6		Paul Stewart
		Jacob Rosenbaum Christian Boettcher
7		
8		Attorneys for Plaintiff
9		Trove Brands LLC d/b/a The BlenderBottle Company
10		
11	Date: September 11, 2023	MC Law, PLLC and Meghan the Attorney, LLP
12		By: /s/ Casey Scott McKay
13		Casey Scott McKay
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22		Attorneys for Defendant
23		TRRS Magnate, LLC d/b/a Hydra Cup
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1	CERTIFICATE OF SERVICE		
2	I hereby certify that on September 11, 2023, I caused the <b>JOINT STIPULATION FOR</b>		
3	ENTRY OF PROPOSED PROTECTIVE ORDER to be electronically filed with the Clerk or		
4	Court using the CM/ECF system, which will send electronic notification of such filing to the		
5	following counsel of record:		
6	Tollowing counsel of record.		
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8	meghan@meghantheattorney.com 95 3rd St., 2nd Floor		
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12	1441 U St. NW, Suite 712 Washington, DC, D.C. 20009		
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15			
16	/s/ Jacob R. Rosenbaum  Jacob Rosenbaum		
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